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(2/28/11) CCG N001

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, LAW DIVISION

DEMY DAVID

(Name all parties)

v.

RBERGS MARKETS INC. (A FOREIGN CORPORATION)

No. 11-L-008140

FREDERICK J. HESS, Esq.
 Illinois agent for Defendant
 325 S. High Street
 Belleville, IL 62220

☐ SUMMONS ☒ ALIAS SUMMONS

each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- ☒ Richard J. Daley Center, 50 W. Washington, Room **801**, Chicago, Illinois 60602
- ☐ District 2 - Skokie
 5600 Old Orchard Rd.
 Skokie, IL 60077
- ☐ District 3 - Rolling Meadows
 2121 Euclid
 Rolling Meadows, IL 60008
- ☐ District 4 - Maywood
 1500 Maybrook Ave.
 Maywood, IL 60153
- ☐ District 5 - Bridgeview
 10220 S. 76th Ave.
 Bridgeview, IL 60455
- ☐ District 6 - Markham
 16501 S. Kodzie Pkwy.
 Markham, IL 60428
- ☐ Child Support
 28 North Clark St., Room 200
 Chicago, Illinois 60602

on must file within 30 days after service of this Summons, not counting the day of service.
 IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

to the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

Atty. No.: 37158

Name: LAW OFFICES OF DAVID ROYD, LTD

Atty. for: PLAINTIFF

Address: 35 E. WACKER DRIVE

City/State/Zip: CHICAGO, IL 60601

Telephone: 800.529.9990

WITNESS, _____

Clerk of Court

Date of service: 12-1-11
 (to be inserted by officer on copy left with defendant or other person)

Service by Facsimile Transmission will be accepted at:

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

EXHIBIT

A

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STATE OF ILLINOIS)
)SS.
COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, LAW DIVISION

JEREMY DAVID,

Plaintiff,

v

DIERBERG'S MARKETS, INC.,
(A foreign Corporation),

Defendant,

)
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)
) Case No.
)
)
)
)
)

PLAINTIFF'S VERIFIED COMPLAINT AT LAW

Now Comes Plaintiff, JEREMY DAVID, by his Counsel, Law Offices of David
Troyd Ltd., and complaining of Defendants, DIERBERG'S MARKETS, INC., a
foreign corporation (hereinafter referred to as "DIERBERG'S"), states as follows:

1. Plaintiff, JEREMY DAVID, is a resident of the State of Illinois, City of
Chicago.

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2. That on JUNE 6, 2011, DIEGRBERG'S owned, operated, managed and maintained a retail grocery store located at 11481 Olive Blvd, ST. Louis, Missouri 63141.

3. At the time and place aforesaid, Plaintiff JEREMY DAVID, was a business invitee lawfully on the premises of DIEGRBERG'S for the purposes of grocery/retail shopping.

4. At the time and place aforesaid, Plaintiff, JEREMY DAVID, was caused to slip, trip and fall by the clear pooled liquid on the floor.

5. At the time and place aforesaid, DIEGRBERG'S, was negligent in one or more of the following respects:

a. Failed to properly maintain their flooring in a safe and reasonable manner;

b. Allowed clear pooled liquid to impede an area traveled by shoppers/invitees;

c. Failed to warn the Plaintiff of the existence of pooled liquid in the area traveled by shoppers;

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d. Was on notice of spill by employee witnessing the customer/person responsible for the spilling and the spilling of the same clear pooled liquid prior to the incident causing plaintiff's injuries;

e. Failed to have slip-proof flooring at or near main checkout areas;

f. As a direct and proximate result of one or more of the aforesaid negligent acts and/or omissions, Plaintiff, JEREMY DAVID, sustained injuries of a personal, pecuniary and permanent nature.

WHEREFORE, Plaintiff, JEREMY DAVID prays that judgment be entered against Defendant, DIECKBERG'S MARKETS, INC., a foreign corporation, for an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) and any other relief this Honorable Court should deem just and proper.


One of Plaintiff's Attorneys

David C. Boyd
Law Offices of David Boyd
35 E. Wacker Drive
9th Floor
Chicago, IL 60601
336-529-3990
Atty. No.: 37158

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STATE OF ILLINOIS)
COUNTY OF COOK) ES.

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, LAW DIVISION

JEREMY DAVID.

Plaintiff,

Y.

DIERBERG'S MARKETS, INC.,
(A foreign Corporation).

Defendant,

Case No:

PLAINTIFFS VERIFICATION PURSUANT TO HCS SECTION 1-169

I, Jeremy David, the undersigned Plaintiff, pursuant to section 1-109 of the Illinois Code of Civil Procedure do hereby state under penalty of perjury that I have read the foregoing complaint at law, and do hereby state that the same is true and accurate to the best of my belief and knowledge.

1. JEREMY DAVIS